

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION

UNITED STATES OF AMERICA	)	CRIMINAL No.: 8:20-cr-00452-DCC
	)	
vs.	)	
	)	<b>UNOPPOSED MOTION FOR</b>
JOHN TOWERY,	)	<b>TEMPORARY MODIFICATION OF BOND</b>
Defendant.	)	
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NOW COMES the Defendant, John Towery, by and through his undersigned counsel, requesting a modification to his bond, pursuant to 18 U.S.C. §3142. This Court granted John Towery a \$25,000.00 unsecure bond, on May 3, 2021 (ECF No. 250). His supervision is monitored by the United States Probation Office in the United States District Court for the District of South Carolina. The terms of his bond include home detention, GPS monitoring and special conditions associated with the charge.

Mr. Towery and his wife own a horse farm where they raise show horses. Mr. Towery's wife will be attending and showing their horses at a horse show in Fletcher, North Carolina, between the dates of June 14, 2021, through June 20, 2021. Mrs. Towery resides in their RV/Camper during the horse show and needs Mr. Towery to tow, set up and pick up the RV/Camper. Mr. Towery currently is not allowed to leave the State of South Carolina except with permission of the US Pretrial or his Probation Officer. Accordingly, Mr. Towery is respectfully requesting that his bond be temporarily modified to allow him to leave the State of South Carolina on Monday, June 14, 2021 and again on Sunday, June 20, 2021, to deliver and pick up the RV/Camper. Mr. Towery will not be staying overnight and will be returning to his home after each trip.

The undersigned has consulted with both Carrie Fisher, Assistant United States Attorney, and Cornelius Sterling, United States Probation Office for the District of South Carolina and they have both indicated they do not oppose this motion.

For the foregoing reasons, John Towery would respectfully request a temporary modification to the conditions of his bond to allow him to leave the State of South Carolina on the above stated dates.

Respectfully submitted,

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s/ Rame L. Campbell

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May 26, 2021